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June 12, 2025

## **VIA ECF**

Hon. Mary Kay Vyskocil United States District Court, Southern District of New York Daniel Patrick Moynihan United States Courthouse 500 Pearl Street, Room 2230 New York, NY 10007

> Re: Philippeaux v. Board for Correction of Naval Records, et al., Case No. 24 Civ. 8732 (MKV)

Dear Judge Vyskocil,

Our firm is *pro bono* counsel for Plaintiff Eddy Philippeaux in this action.

We write to seek leave to file an amended complaint on behalf of Mr. Philippeaux on or before July 11, 2025. Defendants consent to this relief. This request is made to allow counsel time to review and consider all relevant documents and to prepare a single consolidated complaint to move forward in this action. As the Court is aware, Mr. Philippeaux previously represented himself *pro se*, and counsel requires additional time to prepare an amended pleading on his behalf. Moreover, before filing any new complaint, we expect to engage with counsel for the Government to seek resolution on some or all of the claims to avoid further litigation.

This is Mr. Philippeaux's first request for an extension of time in this action.

We thank the Court for its attention to this matter.

Respectfully submitted,

/s/Andrew W. Breland

Andrew W. Breland

For and on behalf of Pallas Partners (US) LLP

GRANTED. Plaintiff shall file his amended complaint on or before July 11, 2025. At which time Defendants may, if needed, renew their letter requesting a premotion conference. Counsel for Plaintiff should advise the Court on or before June 16, 2025 whether the motion pending at docket entry 44 is being withdrawn now that Plaintiff is represented by counsel. The Clerk of Court is respectfully requested to terminate docket entries 55 and 58.

**SO ORDERED.** 

Date: 6/13/2025

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